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2/7/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Jeff Jones, Agent  
OSP Microcheck Inc.  
c/o Delta Analytical Corporation  
12510 Prosperity Drive, Suite 160  
Silver Spring, MD 20904

FEB 7 2014

Subject: 2K7 Bugstick  
EPA Reg. No. 67420-1  
Amendment Application Date: October 16, 2013  
EPA Received Date: October 29, 2013

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), Section 3(c)(5), is acceptable. The agency has no objection to the addition of the site- Oil and Gas Pipelines to the label, and the correction of the alternate brand name from "Slimstick" to "2K7 Slimstick". A stamped copy of the label has been added to the product's record.

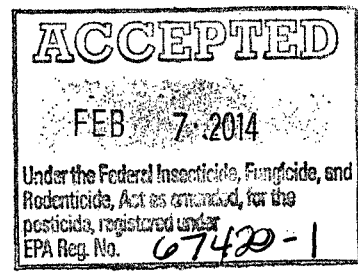
If you have any questions concerning this letter, please contact Amaris Johnson at (703) 305-9542.

Sincerely,

A handwritten signature in black ink, which appears to read "M. Swindell", is written over the typed name "Marshall Swindell".

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)

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# 2K7 BUGSTICK [ABN 2K7 SLIMSTICK]

A solid form microbiocide for use in controlling the growth of sulfate reducing and slime forming bacteria in oil and gas processing, metal working fluids and industrial recirculating water. Not for controlling algae in the state of California.

Active ingredient:	
2-bromo-2-nitropropane-1,3-diol .....	84.5%
Other Ingredients: .....	15.5%
Total .....	100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER**

FIRST AID	
If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.	
NOTE TO PHYSICIAN - Probable mucosal damage may contraindicate the use of gastric lavage.	

See side panel for additional precautionary statements.

EPA REG. NUMBER 67420-1  
EPA EST. NUMBER 67420-CN-01

OSP MICROCHECK INC  
#1, 1715 - 27 AVENUE NE, CALGARY, AB T2E 7E1

NET CONTENTS  
13 LB (5.9 KG) - 50 STICKS [2K7 Bugstick]  
[13 LB (5.9 KG) - 150 STICKS [2K7 Slimstick]]

## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER Corrosive.** Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. For handling activities, use dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P, or HE pre-filter. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear: Coveralls over long sleeved shirt and long pants, socks and chemical-resistant footwear. Goggles or face shield, and chemical-resistant gloves (such as rubber or made out of waterproof material). Do not apply this product in a way that will contact workers or other persons. Wash thoroughly with soap and water after handling. Discard clothing or other absorbent materials that may have been heavily contaminated with the product's concentrate. Remove lightly contaminated clothing and wash separately from other laundry using detergent and hot water before re-use.

### **USER SAFETY REQUIREMENTS**

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly and change into clean clothing.

### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit, and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

### **PHYSICAL AND CHEMICAL HAZARDS**

This product is corrosive to mild steel.

## **DIRECTIONS FOR USE**

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.**

## **GENERAL INSTRUCTIONS**

2K7 BUGSTICK [2K7 SLIMSTICK] is a solid form microbiocide for use in controlling the growth of sulfate reducing and slime forming bacteria in oil and gas processing, metal working fluids, industrial recirculating water, paint, latex and antifoam systems.

2K7 BUGSTICK [2K7 SLIMSTICK] is typically recommended at 100 ppm active ingredient which is equivalent to 1 stick [3 sticks] per 1000 liters or 264 gallons. For each application area the dose can vary from 15 to 1000 ppm active ingredient. Refer to specific directions for use.

If a heating stage is involved during the manufacturing process add 2K7 BUGSTICK [2K7 SLIMSTICK] when temperature has cooled below 40°C.

## **OIL AND GAS APPLICATIONS**

Use a weekly shock dose of 1 stick [3 sticks] per 264 gallons based on the water content of the system until control is achieved. Thereafter, use a maintenance dose, once or twice weekly of 1 stick [3 sticks] per 1056 gallons.

In Gas Wells: apply through the wellhead valving system so product drops down tubing.

In Oil Wells: drop product down tubing when sucker rods are pulled.

In Storage Tanks: drop through thief hatch.

In Oil and Gas Pipeline: drop directly into the water bottom, pipeline or add to the hydrocarbon phase. Treat once daily for pipeline maintenance to once every one or two months for both storage and transportation systems. Apply stick(s) to achieve 25-200 ppm active ingredient in the aqueous phase (2 sticks per 264 gallons is 200 ppm) [(6 sticks per 264 gallons is 200 ppm)]. Add higher concentrations to the hydrocarbon phase, which will result in longer term protection by gradual diffusion into the water phase. Dose will depend on the volume of crude or oil and the expected water fraction.

Re-treat with a weekly shock dose if re-contamination is observed. Do not apply directly with oxygen scavengers, but treat alternatively.

This product may be used in terrestrial and off-shore oil drilling muds and packer fluids.

## **METAL WORKING FLUIDS**

2K7 BUGSTICK [2K7 SLIMSTICK] is recommended for use in soluble oils, semi-synthetic and synthetic fluids. It should be added directly to the sump (with agitation) and the system should be circulated for about one hour before shutdown.

Use 3 to 10 sticks [9 to 30 sticks] per 264 gallons of the fluid by applying directly into the sump. A subsequent, weekly dose of 1 stick [3 sticks] per 132 to 264 gallons is recommended to maintain control.

## **INDUSTRIAL RECIRCULATING WATER**

2K7 BUGSTICK [2K7 SLIMSTICK] may be dosed directly into the sump or basin or it may be added to the cooling water return at a suitable point. The dosing point should be located where there is adequate flow or turbulence to ensure quick dissolution and rapid dispersal around the system (e.g. the pump outlet from the tower sump).

A shock dose of 1 stick [3 sticks] per 264 gallons should be added to the cooling water once or twice weekly. Thereafter, use a weekly maintenance dose of 1 stick [3sticks] per 528 to 1584 gallons.

## **PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS**

To provide in-can preservation and inhibit the growth of bacteria in wash waters and during storage of emulsion concentrates and latex emulsion based paints. Also for the preservation of silicone and other antifoam emulsion systems.

2K7 BUGSTICK [2K7 SLIMSTICK] may be added to the aqueous phase at any convenient point during the manufacturing process, preferably where there is product agitation. They may be added as a final step prior to packing of the product into bulk or sales packs, but allowing sufficient time for dissolution and dispersion

Dose 2K7 BUGSTICK [2K7 SLIMSTICK] at 4 to 19 sticks [12 to 57 sticks]/1056 gallons of the final formulation volume.

## **INDUSTRIAL AND/OR COMMERCIAL AIR WASHERS, AIR CONDITIONING AND HUMIDIFYING SYSTEMS**

For the control of bacterial and algae growth and to remove slime deposits. Dosing should be carried out into the water sump on a routine basis once per week or month. Heavily fouled systems may require twice weekly treatment.

Initial dose with 1 stick [3 sticks] per 528 gallons. Subsequent dosing can be reduced by half.

Intermittent treatment during regular maintenance and cleaning using 1 stick [3 sticks] per 264 gallons is also recommended with a contact time of at least one hour.

For smaller systems (264 gallons) [( < 45 gallons)] one stick may be broken in half and then added.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Keep away from heat. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Inner package is water soluble. Offer empty outer package for recycling, if available, or dispose of in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

[Batch Code]